REMARKS:

Status

Claims 31 to 50 and 57 to 60 are pending. In this response, claims 53 to 56 have been

cancelled, claims 40, 57 and 58 have been amended, and claims 59 and 60 have been added. Claims

31 and 43 are the independent claims. (Claim 40 was independent but has been amended into

dependent form.) Reconsideration and further examination are respectfully requested.

Rejections

Claims 31 to 37, 40 to 50, and 53 to 58 were rejected under 35 U.S.C. § 102(e) over

U.S. Patent No. 5,761,669 (Montague). Claims 38 and 39 were rejected under 35 U.S.C. § 103(a)

over Montague in view of U.S. 5,893,086 (Schmuck). Applicants respectfully traverse these

rejections.

Claims 31 to 42 and 57: Claim 31 is the independent one of these claims and is

reproduced below:

> 31. A method of operating a file server, said method including steps of:
> identifying a file on said file server with a first security style selected from among a plurality of security styles corresponding to a plurality of operating systems implemented on said file server; and
> enforcing said first security style for all accesses to said file including accesses in another one of said plurality of security styles.

The applied art does not appear to Applicants to teach all of the features of this claim.

In particular, a plurality of operating systems do not appear to be implemented on one of Montague's

file servers. Rather, the servers in Montague each appear to Applicants to implement a single operating system.

In support of Applicants' assessment, Applicants respectfully direct the Examiner's attention to col. 5, line 65, to col. 6, line 6, of Montague. At col. 5, lines 65 to 67, Montague states that "it is becoming increasingly common for a network to be coupled to a plurality of servers, each of which runs different operating systems." Applicant acknowledges that this language is somewhat unclear as to whether each server runs a single operating system or plural operating systems. Applicants respectfully submit that the examples which follow this text at col. 5, line 67, to col. 6, line 6, clarify the issue. Each of those examples is of a single operating system on each server. These examples are reproduced below:

> For example, in network 10, server 12 may be booted up to run on Microsoft's WINDOWS NT operating system; server 14 may run under Novell's NETWARE™; and server 16 may operate under Distributed Computing Environment (DCE) UNIX or some other DCE compliant operating system.

Applicants see no language in Montague that contradicts Applicants' assessment that no one of Montague's servers implements plural operating systems.

In view of the foregoing, Applicants respectfully submit that Montague does not teach claim 31's feature of "a plurality of operating systems implemented on said file server." Schmuck does not appear to Applicants to offer anything to remedy this deficiency of Montague. Accordingly, claim 31 and its dependent claims are believed to be allowable over the art applied in the Office Action. Such action is respectfully requested.

Claim 59: This new claim also depends from claim 31. Claim 59 is believed to recite

features which further distinguish the invention from Montague and Schmuck. In particular, claim

59 recites the following:

> 59. A method as in claim 31, wherein said step of enforcing further
> comprises making a translation of an access control list to access
> permissions; and
> further comprising the step of caching said translation.

The word "cache" or any variant thereof does not even appear in Montague. Schmuck

was cited for teaching a form of caching in the rejection of claim 38 and 39. The cited text in

Schmuck discusses caching of "ACL data." See Schmuck, col. 28, lines 60 to 65. Applicants

respectfully submit that caching of "ACL data" as taught by Schmuck is not equivalent to caching of

a translation as recited by new claim 59. Accordingly, claim 59 is believed to be allowable over and

above claim 31 for this additional reason.

Claims 43 to 50, 58: Claim 43 is the independent one of these claims and is

reproduced below:

> 43. A file server including:
> a set of files available on said file server, each said file having an
> associated security style selected from among a plurality of security styles
> corresponding to a plurality of operating systems implemented on said file
> server;
> wherein said file server enforces said associated security style for all
> accesses to said file including accesses in another one of said plurality of
> security styles.

In particular, as discussed above, the art applied in the Office Action does not appear

to Applicants to teach a plurality of operating systems implemented on a file server. Accordingly,

claim 43 and its dependent claims are believed to be allowable over that art. Such action is respectfully requested.

Claim 60: This new claim also depends from claim 43. Claim 60 is believed to recite features which further distinguish the invention from Montague and Schmuck. In particular, claim 60 recites the following:

> 60. A file server as in claim 43, wherein enforcing said associated security style comprises making a translation of an access control list to access permissions; and
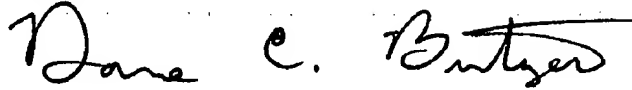> wherein said translation is cached.

The word "cache" or any variant thereof does not even appear in Montague. Schmuck was cited for teaching a form of caching in the rejection of claim 38 and 39. The cited text in Schmuck discusses caching of "ACL data." See Schmuck, col. 28, lines 60 to 65. Applicants respectfully submit that caching of "ACL data" as taught by Schmuck is not equivalent to caching of a translation as recited by new claim 60. Accordingly, claim 60 is believed to be allowable over and above claim 43 for this additional reason.

Closing

In view of the foregoing amendments and remarks, the entire application is believed to be in condition for allowance, and such action is respectfully requested at the Examiner's earliest convenience.

Applicants' undersigned attorney can be reached at (614) 486-3585.   All correspondence should continue to be directed to the address indicated below.

Respectfully submitted,

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